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SEP 16 2004
Rm R-5-123
YOSEMITE NATIONAL PARK

Alan Kunz

To: Mitzl Thornley/YOSE/NPS@NPS

09/13/2004 01:47 PM
PDT

cc:
Subject: Possibly Spam: merced river scoping comment; thanks

Pg1

----- Forwarded by Alan Kunz/YOSE/NPS on 09/13/2004 01:50 PM -----



To: <yose_planning@nps.gov>

cc:
Subject: Possibly Spam: merced river scoping comment; thanks

09/10/2004 09:10 PM
MST

Superintendent, Yosemite National Park
Revised Merced River Plan, Scoping Comment
Sept. 10, 2004

<?xml:namespace prefix = o ns = "urn:schemas-microsoft-com:office:office" />
Sir:

In an ideal world where all people are responsible for their own actions and for being informed and caring stewards of the environment, Merced River user capacity management would be unnecessary. As the almost 4 million people visiting Yosemite each year prove, this is unrealistic given just the mass and concentration of those visitors. Human impact to the unique and beautiful river environment created by the Merced River in Yosemite can be managed to increase the effective user/environmental carrying capacity, inherently monitor and adjust user levels as required, and to allow (currently forbidden) recreational boating use of one of the most scenic easy/moderate recreational river reaches in the world. Please consider this when assessing user carrying capacity and the resulting user management guidelines on the Merced River in Yosemite Valley.

As with permit-required backcountry use in Yosemite and elsewhere, a combination of limited availability permits and access/egress trailhead points could be used as is done in numerous other river areas to monitor user numbers, ensure that rules and regulations are known to visitors and enforceable, and to allow access by conscientious users that then would be able to help educate non-participant visitors, as well as help collect the significant amount of floating trash/debris that comes from upstream users, campgrounds, etc. If justifiable, docent-guides (volunteer or contract/private) might accompany permitted river paddler/user similar to numerous government - local, state, NPS, BLM, USFS - areas containing caves, rivers, archaeological sites and other resources that are both fragile and desirable for recreational appreciation and interpretation.

My experience as a 15-year Yosemite resident and frequent river user (recreationally and with YOSAR) along the entire reach from above Happy Isles to below Pohono Bridge has me believe that the majority of the potential negative user impact occurs along the banks in fragile riparian areas where the vegetation/habitat cannot withstand the crush of humanity. Before Park management restricted recreational boating to a short section of Class 1 water, I learned to kayak

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Pg 2 of 2

and collect trash in my cockpit with a small group of mostly local paddlers in the reach between Happy Isles and below Pohono Bridge. Most upstream segments include large sections of easy moving water perfect for novices and learning. The section between the moraine at Bridalveil Creek and to just below Pohono Bridge is a very high quality short Class 3-4 kayak run when the river features are combined with the obvious scenic advantage of location. There are adequate river access sites amongst those already in regular use by other visitors. The paddler/user cycle might last 3 months in spring and into summer, longer in the up-canyon and slower flow areas.

The user restrictions of the past 10 years or so undoubtedly have served to help protect sensitive riparian areas, but also limit the value of local indicators of user impact and user capacity. Current Yosemite Park restrictions on river recreation seem to have a deliberate and positive effect on visitor protection.

Requiring use of designating access points, forbidding non-emergency bank access, sharing information on river features and potential hazards, and permit issuance that includes signature-acknowledged education of rules/regulations and compliance responsibility is a common means of limiting impact and monitoring user/environment carrying capacity while controlling that same impact as needed.

Thank you to all involved in protecting the Merced River from those of us who might inadvertently damage that which we so love and enjoy. I greatly appreciate this opportunity for input into the Revised Merced River Plan.

El Portal, CA



Superintendent.doc

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SEP 16 2004
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YOSEMITE NATIONAL PARK

Alan Kunz

09/13/2004 01:46 PM
PDT

To: Mitzi Thornley/YOSE/NPS@NPS

cc:
Subject: Possibly Spam: Revised merced River Plan/SEIS

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----- Forwarded by Alan Kunz/YOSE/NPS on 09/13/2004 01:49 PM -----



To: Yose_Planning@nps.gov

cc:
Subject: Possibly Spam: Revised merced River Plan/SEIS

09/10/2004 08:25 PM
MST

To Whom It May Concern:

As a 25 year resident of El Portal I offer the following comments on the Revised Merced River Plan:

I. Merced River User Capacity in El Portal

The study of User Capacity for the Merced River corridor must take into account, and project into the future, the enormous increase in visitor and residential activity in the El Portal segment of the river corridor which has taken place in the past 10 years. This increase is due in large part to the greatly expanded lodgings at Park Line and Cedar Lodge, and also, in part, as a result of the increased population of the El Portal community. We have also seen an increase in the park visitor who, in the past, would have simply driven through El Portal but is now attracted to stop by the sight of user activities such swimming, kayaking, and rafting. A gathering of people and parked cars at a scenic spot will always attract additional travels to stop and explore. Such is increasingly the case in the El Portal area.

The user activity in this geographic area will dramatically increase in the coming years and decades as a direct result of the Yosemite Valley Plan which mandates moving facilities, operations, and employee housing to El Portal, potentially doubling or tripling the local population.

The opening of the University of California campus at Merced will create an entirely new and very large population of visitors who will be attracted to the El Portal area of the river, particularly for recreation, kayaking, and rafting. El Portal is a potential destination for this new student population who may well visit the El Portal area of the Merced River corridor for day use without ever travelling into Yosemite National Park.

The level of user activity in the El Portal river segment over the past decade has been very significant. The potential for change in the coming decade is enormous. The User Capacity study must account for the dynamic and impact of these two new population groups.

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II. Merced River Corridor Boundry in the El Portal Administrative Site

Cultural Outstandingly Remarkable Values as a guiding principle for determining the river corridor boundry

in El Portal must also recognize and include the 100 year modern history community of El Portal. From its inception the community has played an important role in the history of Yosemite National Park, as it has evolved from a logging and mining community, to a transportation gateway for the Yosemite Valley Railroad, to a residential community supporting the operation of the national park.

The assessment of remarkable values speaks directly to Archeology sites management and historic properties. The Native American History of the El Portal is rich in archeological sites. The contemporary community of El Portal has only a few historical structures that qualify, by definition, as Outstandingly Remarkable Values.

What is present in El Portal , however, is a thriving working and middle class community of National Park Service employees, park concession employees, and many others working in contributing roles to Yosemite. It is a community that is, in many ways, unique to the National Park system.

Therefore, the determination of the Merced River Corridor Boundry in El Portal should also include a strong consideration of local community values in addition to the defined cultural values. The future of the El Portal community is a keystone element of the implementation of the Yosemite Valley Plan. Community values and cultural values must go hand in hand in planning the future of a community whose history is inextricably linked both to the history and to the future of Yosemite National Park.

Sincerely,

El Portal
California

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YOSEMITE NATIONAL PARK

Fig 1

Alan Kunz

To: Mitzl Thornley/YOSE/NPS@NPS

09/13/2004 01:46 PM
PDT

cc:
Subject: Fw: river plan comments

----- Forwarded by Alan Kunz/YOSE/NPS on 09/13/2004 01:49 PM -----



09/10/2004 07:36 PM
MST

To: "Yosemite Planning" <Yose_Planning@nps.gov>
cc:
Subject: Fw: river plan comments

----- Original Message -----

From:

To: yoe_planning@nps.gov

Sent: Friday, September 10, 2004 4:28 PM

Subject: river plan comments

Hello Jen,

Here are my comments on the first scoping of the Merced River plan re-do.

These comments are a brief idea of what I feel are values to protect in El Portal part of the canyon. The next scoping period I will concentrate on creative ideas in dealing with development around areas of value.

I am also attaching a document that was the El Portal Town Planning Advisory Committee collective comments on the first Merced River Management Plan. These comments were submitted to the Mariposa Board of Supervisors advising them on how to comment on the El Portal area. The BOS submitted them to the NPS as part of their comments on the River Plan. I am just submitting them to you now as part of my personal comments so that you have them for a reminder of what was considered valuable to folks in El Portal during the last go around.

Mainly I feel that the El Portal section of the river does not have much buildable space. I feel that many of what we may consider buildable spaces are the only parts of the canyon that have gentler slopes to the river and therefore are corridors to the river for wildlife and also hold cultural resources. The river corridor through El Portal is sensitive although it has been impacted therefore I feel it is important to concentrate development in impacted areas, rather than impacting new areas. The 1997 flood made it clear what parts of the canyon held up at stayed dry. Some areas of impact should be reevaluated and the development could be changed to suit the area better. Odgers bulk fuel facility is one of these areas. Hillside East and West is an example of an area that should be protected from impact because of cultural and natural resources of value. The Trailer Village is an area that is impacted and survived the 1997 flood and could be reevaluated as to what development would best suit that area. These are a quick summary of my thoughts, but I feel I and a few others from El Portal could best describe the values in this area by taking you and anyone else from planning on a tour of El Portal, if that fits into the protocol you must follow. Let me know. I will be more detailed in my comments through the next scoping period.

Sincerely,



riverplancomm(x).doc

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COMMENTS ON THE MERCED RIVER PLAN

Drafted by a subcommittee of the El Portal Town Planning Advisory Committee

Approved by the El Portal Town Planning Advisory Committee

SEP 16 2004

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Pg 2

As an opening statement, we would like to address the fact that, as it stands, El Portal is the only section of the Merced River Canyon that does not have a scenic value placed on it. We feel that this section of canyon is a scenic wonder and in River Management Plan terms, there are sections that undoubtedly warrant adding scenic values to the El Portal River Corridor. The following comments are about areas of concern in El Portal and strong recommendations for them, all of which are in accordance with the Compliance, Measures common to all action alternatives of the MRP.

- **The Sand Pit:** No Park operations and administration. This is in direct conflict with the goals, criteria, ORV's, and RPO for this area. The Sand Pit is a floodplain with a braided stream channel and the free-flowing character of the river should be protected. Any development, be it parking or sand extraction, would directly conflict with protecting and enhancing the free-flowing nature of the river in this area. This area should not be considered existing use or development. The southwest end is currently used for a **temporary** construction staging area. It was the intention of the compliance that allowed the temporary construction staging, that the area would be cleaned up and restored to natural conditions at the completion of the El Portal road project. In addition, the current uses as a temporary staging area may be having unfortunate repercussions on water quality. There are no boundaries to the staging area marked on the site. Since the flood materials that include asphalt and concrete have been pushed over the bank and into the streambed. The Sand Pit is a rich, diverse, riparian area within the main Merced River channel. Undeveloped floodplains are relatively rare in this stretch of the Merced River. Let's protect and enhance it as we should under our obligations under the Wild and Scenic Rivers Act. Should be zoned as 2A, open space with minimal impacts, restoration to a natural river channel, and definitely no dumping practices.
- **Middle Road:** No Park operations and administration. Alternatives 2 and 5 show the middle road as administrative use and is currently being used as operations for the Park, a dump. It has only been within the last decade that this area has gone from a natural area to a dump. With the construction of maintenance facilities at Railroad Flat, the old bone yard disappeared and was replaced, with no environmental compliance, by the Middle Road, the Park Service dump in El Portal. The dirt road through this area is fine for access for residents and emergency vehicles, but otherwise should be zoned 2A for protection of oak woodlands, wildlife corridor, and riverbank protection.. Restoration to natural conditions. Minimal impacts. There is sufficient dumping space at the Railroad Flat Maintenance facility.
- **Trailer Village:** No Park operations and administration. The levee channeling the river forces high water to fully impact the Foresta Road, which is necessary for transportation of locals, emergency vehicles and Park operations. Removal of the levee and other previous developments allowing the river to overflow in the Trailer Village area would reduce impact to the Foresta Rd. and allow the oak riparian habitat, wetlands and river channels to be restored to natural conditions. This area contains cultural and historic values consisting of Indian grinding rocks and the old Hennesey Ranch orchard. If restored to natural conditions, it would create an additional wildlife corridor from the south canyon ridges to the river with a woodland cover between the highway and the river, which is uncommon in this narrow canyon. This area should have 2B zoning. Low impact, but because it is right off the highway, it should have a trash receptacle with regular maintenance.
- **Land Exchange:** There are no alternatives that recognize this area as worthy of protection. This area exists today under Federal ownership, on the map as part of the El Portal Administrative site. The Merced River Plan states that its action alternatives do not prescribe management activities for privately held lands.

Therefore it is imperative to retain this parcel in federal ownership. In the environmental consequences of the MRP the land exchange is stated as having potential adverse effects to wildlife; wetlands; cultural resources; rare, threatened, or endangered species; geology; geohazards; soils; ethnographic resources; historic resources; and hydrological processes. Missing was the potential adverse effects to scenic resources. Since the time the El Portal Administrative site was set aside by congress the Sierra Nevada has experienced a great loss of wetland and riparian areas. The Sierra Nevada Ecosystem Project listed riparian ecosystems at this elevation as some of the most threatened. The land exchange is inconsistent with the goals stated for the Merced River Plan. Furthermore, the management zone prescription assigned by the plan is inappropriate. Currently the area within the eight or nine acres is totally undeveloped, not a popular destination, with very limited accessibility. The 2A+ classification of undeveloped open space is more appropriate and consistent with the current uses and unique resources. The Merced River Plan implies that acquisition of private properties in Wawona could be pursued by outright purchase to enhance the outstanding remarkable values. If it were a priority to move the Arch rock station the outright purchase of the necessary private land would protect this area presently held in federal ownership, which holds so many highly valued resources.

- **Crane Creek and Moss Creek:** These should be within the Wild and Scenic River Boundaries. They are both major tributaries to the Merced River. Both deserve an overlay protection. Crane Creek in El Portal and Foresta has developed areas, but should have new limitations. The corner of Moss Creek in the Rancheria section of the El Portal Administrative site, though a small section, should have recognition as being under NPS care taking.
- **Odgers Bulk Fuel Facility:** Another Example of beautiful oak woodlands including Valley Oaks, a variety rare in El Portal. This area would also be a natural river overflow channel. The Bulk Fuel Facility is a point source of pollution. This area should not be Park operations and administration, but zoned 2B, Discovery. It should be a model of restoration from an environmental disaster area to a beautiful Valley Oak woodland, riparian habitat, and overflow river channel to be protected and enjoyed.
- **River Overflow Channel Restoration:** There are no alternatives including the linking of the old river channel with the main stem. Wetland species, including an overstory of cottonwood, mature willow, and amphibians, exist and inhabit in the entire area, extending from behind the El Portal Hotel to where this former channel or oxbow meets the river. The area behind the market is degraded due to the colonization of exotic berries but is inundated from both hillside drainage and groundwater. With the relocation of the storage and access drive used by the Yosemite Institute behind the hotel and underground utilities the restoration of this area, to a more functional wetland, would be feasible. This area already has many wetland components and functions including its historic oxbow topography. It makes no sense to develop this area when it can so easily accomplish goals set aside in the River Protection Overlay including links to groundwater, backwater, tributaries and exchange of nutrients to the river. This would buffer surrounding development from flood damage and filter run-off draining to the river. All the measures of the River Protection Overlay should be applied to this area, which provide for the restoration of this natural riparian area. New construction in this area would be inconsistent with the RPO by impeding linkages to the river.
- **Hillside East and West:** Zoned as a Park operations and administration site, new development should be minimal because slopes with drainages makes for radiating impacts which all flow down to the river. Also, any development should be done with taste and consistent to scenic values. If development was deemed absolutely necessary in this area, the Community and County need to be consulted on design and the East and West sites should not be linked so that the drainage between is undisturbed and somewhat of a wildlife corridor will remain. This area is a well-used wildlife corridor and any development would be tremendously impacting. This area offers a site for development without being on the river shore, but we would prefer this not to be zoned Park Administration and operations because we feel no new development is necessary in El .

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Yosemite National Park

pg 4

Portal. We feel the Park has alternatives for development that have not been fully explored and should be Partnering with Mariposa County for development is an alternative and both entities would benefit. More permanent housing in the Yosemite Valley is an option if some of the more unnecessary aspects of the Concession are minimized. Also, the National Park Service, caretaker of natural resources, should always be thinking of minimizing the footprint when it comes to any development. Rather than breaking new ground why not develop adjacent to areas already developed? This narrow river canyon can not hold the infrastructure necessary to increase the population of the town of El Portal by much. This area should be zoned 2C.

- **Railroad Flat:** This area of Park operations and Administration being on the river should have strict guidelines to keep it functioning consistently with the Wild and Scenic River protection act. This facility must lay partly in the boundary. It is absurd that the Maintenance and Warehouse were removed from an area in Yosemite Valley that was well away from the river boundaries and then brought to El Portal and placed right on the river shore. What's done is done. We now have the opportunity to reverse some of the damage that has been done. A place to start would be to greatly reduce the lighting, which shines on the river all night. This is far from wild and scenic.
- **El Portal Community, Town and Town Planning Advisory Committee:** There is no mention anywhere in any of the alternatives of El Portal being a town or a community, only an administrative site. This is very wrong. There was a town here long before the land was purchased as an administrative site and there has been a town since. There is also an active Town Planning Advisory Committee, of which no mention was made in any alternatives, although Wawona's Town Planning Committee was mentioned. It is very hard to believe that this was an oversight! We demand to be recognized as a community. We are taxpayers and are Yosemite Natl. Park's main support. We should be considered and consulted.
- **The Draft River Plan Document:** We hope you are being flooded with comments on how wasteful the production of this temporary document was. Money and resources are two things the National Park Service is faced with reduction of, yet are abusing in the production of this document. Again, what's done is done. We hope you are preparing a massive recycling program for this document. Money, in this case, should not be a factor. Your integrity is at risk and so are trees. For when there is a next time, why not print on recycled paper, print all the way across the page, and have a summary for the majority of the public unless otherwise requested. On a brighter note, it is good to see that the plan was made available to so many people.
- **Controversial Activities:** The Merced River Plan provides a good foundation for future management of the river, but the plan's apparent inability to apply fundamental river protection to controversial activities-such as road widening and proposed visitor facilities-potentially remains a fatal flaw. The plan needs to set specific standards and guidelines to ensure protection of the Merced River's free flowing character, outstanding values, and segment classifications.
- **Pg. 1-34; User Capacity:** The plan needs to address how the Visitor Experience and Resource Protection process will determine the appropriate (minimum, expected, maximum) number of people and facilities, and type of development, suitable for El Portal and there should be coordination with Mariposa County planning processes.
- **Figure II-7:** This figure could benefit from the addition of an inset map of Old El Portal and Rancheria Flat. This would greatly improve the readers understanding about the current community infrastructure. There is nothing in the key of this map that shows residential areas.
- **Figure II-11:** Why isn't the sewage treatment plant included in the 3C Developed Zone overlay?

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- **Pg. II-142, Geology, Geohazards and Soils:** Soil mitigation measures should be further explained. The Merced River Plan requires investigations "as warranted" but does not define when or where this may be the case. This management plan should include guidelines, such as types or extent of impact that could damage an Outstandingly Remarkable Value that would warrant an investigation. Also, all compliance measures under mitigation measures are stated to be warranted "when practicable". This is not defined anywhere and is open to speculation. Pg 5
- **Pg. III-24, This** should include a section on El Portal soils in the River Gorge section.
- **Pg. III-59, Merced River Gorge Wetland and Aquatic Habitats:** When referring to El Portal in this section, the sentence "Direct human intrusion into the riparian areas of this river zone is minimal; due to topography." Is accurate for the southern bank, but certainly not the northern bank. Also, the heading of *Aquatic Habitats* seems like it should include benthic and faunal information (besides *Fish*). This is also the case in Document Two, Alternative One, and PG. IV-47.
- **Pg. III-119, Visibility Protection:** There should be a note that while Yosemite is a class I airshed, El Portal is in a class II airshed.
- **Pg. IV-92, Alt. One, Doc. Two, Air Quality:** What rationale supports the identification on the Highway 41 extension as having a no-net adverse impact on El Portal (River Gorge) air quality? (comment also applies to Alt. Two)
- **Pg. IV-201, Alt. Two, Doc. Two, Air Quality-Present Actions:** The last sentence is highly speculative. Air quality studies to date have not been able to for see the actual amount of park visitation via private automobile that would occur in clean fuel vehicles. The private clean fuel vehicle is currently an option whereas a clean fuel charter bus is not.
- **Pg. II-23, River Protection Overlay (7): Actions** to "reconstruct, repair, or rebuild essential Park facilities...within the bed or on the banks of the river are permitted even if they impact the free flowing condition of the river, provided that..." would not protect the river and does not belong in something titled protection.
- **In General:** We are pushing for an alternative that includes all of our comments, a River Protection Overlay with a wide corridor in El Portal, recognition and classification of El Portal as an area containing Outstandingly Remarkable Values, and the recognition and classification of The El Portal Town and administrative site. Our Town Planning Advisory Committee would have liked to have been consulted in this Process. The Merced River canyon through El Portal is a beautiful, vulnerable wonder and should be protected. That is the National Park Service's duty. Why allow new impacts in beautiful wild places? This is inconsistent with NPS goals. Why not eliminate unnecessary impacts in sensitive areas and restore them to their natural beauty? This would be honorable and commendable of the Park Service. Anything in this narrow canyon affects the Wild and Scenic Merced River. The main concern should be to preserve and protect.

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Alan Kunz

09/13/2004 01:45 PM
PDT

To: Mitzi Thornley/YOSE/NPS@NPS

cc:

Subject: Merced River Plan replacement

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Pg 1

----- Forwarded by Alan Kunz/YOSE/NPS on 09/13/2004 01:49 PM -----



To: <yose_planning@nps.gov>

cc:

Subject: Merced River Plan replacement

09/10/2004 05:40 PM
MST

September 10, 2004

Superintendent Mike Tollefson, Yosemite National Park

Attn.: Merced River Plan/SEIS
P.O. Box 577
Yosemite, CA 95389

Dear Superintendent Tollefson:

Please consider this letter as my personal comments apart from what the County of Tuolumne has submitted.

I am concerned that the National Park Service has failed to broaden scoping to include all aspects of the Comprehensive Management Plan (CMP). In ruling against the National Park Service and for the plaintiffs, Friends of Yosemite Valley and Mariposans For Environmentally Responsible Growth, the Court highlighted two specific tasks that must be undertaken to correct the Merced River Plan. Those two tasks are 1) addressing user capacities and 2) setting proper management boundaries for the El Portal area. The court, however, also stated that **"they did not otherwise uphold the CMP."** Thus, the CMP is invalid and the current scoping period is flawed because

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YOSEMITE NATIONAL PARK

the National Park Service has failed to inform the public that all aspects of the CMP are up for review, comment, and change. Furthermore, the adopted Yosemite Valley Plan depended on there being a valid CMP. Since the CMP is invalid all projects contained in the Yosemite Valley Plan, as well as any other project planned for Yosemite Valley or the El Portal area, must not only be suspended until completion of a new CMP, but the public should have been informed that all projects are once again subject to public review and comment. Additionally, all the projects contained in the YVP or otherwise currently being planned may have to be changed or eliminated once a valid CMP is in place. Pg 2

In addressing the specific issue of "user capacities," the National Park Service should explain how protecting the Wild and Scenic Merced River only entails identifying "user capacities" within the Wild and Scenic corridor. Superintendent Tollefson has publicly stated that user capacities for Yosemite Valley as a whole are not being studied at this time. It is difficult to believe that any development planned for the floor of Yosemite Valley is not going to impact the Merced River's Wild and Scenic Corridor. The National Park Service should identify how impacts associated with over night guests and their supportive services will not be allowed to stray into the Wild and Scenic Corridor. The number (capacity) and type of users located adjacent to the Wild and Scenic Corridor is as important, or more important, than the number and type of "users" that will be allowed within the corridor. The National Park Service must define the type and number (capacity) of users it will allow to occupy or otherwise recreate in Yosemite Valley as a whole, whether day visitor or over night guest, in order to insure protection of the Wild and Scenic Merced River and comply with the Court's directive to revise (or otherwise replace) the current CMP.

In determining user capacities, the type of "use" is as important as the total number of "users." For example campground visitors will have a different demand on in-Valley utilities versus lodging guests. The National Park Service must have an objective methodology in place to quantify the various impacts associated with the different types of recreational activities that are to be allowed in Yosemite Valley. Distinctions between mode of travel into Yosemite Valley must also be made when determining user capacities. For example private sedans have a much different impact on road systems than over-the-road-motor coaches and shuttle buses. Historic recreational activities and access patterns should be provided the same level of assessment as proposed new activities and access patterns. For example, traditional family based auto touring is already accommodated by the existing infrastructures while the proposed mass transit, tourist bus system demands extensive reconstruction in the Valley floor.

The National Park Service should analyze proposed infrastructure changes to determine if these changes are growth inducing. For example, the National Park Service has stated that by converting to a mass-tourism transportation system, visitor attendance can more than double.

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Going from four million visitors per year to eight million or more will have an effect on Yosemite Valley. The National Park Service needs to detail in the new CMP how doubling Yosemite's annual attendance will not have an adverse impact on the Wild and Scenic Merced River. The new CMP also should address out-of-Valley impacts and Gateway Region impacts.

Pg 3 of 3

In closing, it appears that the National Park Service is taking a very narrow interpretation of the Court's directive to revise (or replace) the existing CMP. If the National Park Service does not look at alternatives to the currently planned projects, and if the National Park Service does not look at the broader aspect of visitor use and type than occurred with the current invalid CMP then they will not be in compliance with the terms of the Court's ruling and a new round of litigation will result. I would ask that the National Park Service reopen scoping with clarity to the American public that all options are again on the table for discussion. The National Park Service should also simply consider returning the Yosemite Valley floor's infrastructure to pre-1997 flood conditions as stipulated to the National Park Service by Congress and the President in the flood recovery funds that were awarded to Yosemite National Park. This would save millions of dollars, advert gross commercialism of the Valley floor, protect access for the average American family, and usher in a higher level of environmental protections than the adopted plans could ever have attained.

Sincerely,

Groveland, CA